

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL A. FERRIS,

Defendant.

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FILED UNDER SEAL

CRIMINAL NO. 20-mj-8160-GCS

Title 18 United States Code
Sections 2251(a) and 2422(b)

CRIMINAL COMPLAINT

I, Eric Bowers, Special Agent with the Department of Homeland Security Investigations, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1

PRODUCTION OF CHILD PORNOGRAPHY

On or between May 1, 2020 and May 31, 2020, in White County, within the Southern District of Illinois and elsewhere,

MICHAEL A. FERRIS,

defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, herein identified as Minor Victim 3, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which depicts Minor Victim 3 having sexual intercourse with a minor male, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer and cellular phone, all in violation of Title 18, United States Code, Section 2251(a) and (e).

AFFIDAVIT

Your affiant is a Special Agent with the Department of Homeland Security Investigations (HSI), currently assigned to the Springfield, Illinois Field Office and has been so employed since

December 2006. Your affiant is responsible for investigating criminal violations relating to child exploitation and child pornography, including Title 18 U.S.C. Sections 2251, 2252, and 2252A, involving illegal production, distribution, receipt, and possession of child pornography.

The statements contained in this affidavit are based on the investigation of your Affiant, as well as information derived from reports and interviews of the law enforcement officers and witnesses named herein. In support of this Complaint, your Affiant states as follows:

1. Law enforcement conducted an investigation into an unknown subject that has revealed that in and around April and May of 2020, FERRIS created fake Facebook profiles, in which he pretended to be a juvenile female, to communicate with, coerce, and extort multiple juvenile females to produce and send him sexually explicit pictures and videos of themselves.
2. In June of 2020, Detective Steve Bohn from Jackson County, Oregon Sheriff's Office identified a 16-year-old female (hereinafter Minor Victim 1/ MV1) who reported an unknown individual coercing MV1 into sending nude images of herself via Facebook on May 8, 2020 between 12:30:11 UTC and 12:59:00 UTC.
3. In May of 2020, investigators in Aurora, Missouri identified a 14-year-old female (hereinafter Minor Victim 2/MV2) who reported an unknown individual coercing MV2 into sending nude images of herself via Facebook between April 25, 2020 and May 20, 2020.
4. Facebook records and cellphone records showed "Sammy Gray" conversing separately with MV1 and MV2. In each of the conversations, "Sammy Gray" asks similar questions of the minor victims. "Sammy Gray" inquires about the victims ages, about a brother seeing the victims showering or changing, about sexual contacts, and requests sexually explicit images of the juvenile victims' nude breasts. In each instance, MV1 and MV2 comply with "Sammy Gray" demands of sending sexually explicit images of their breasts in exchange for not reporting their brother to police. After sending images,

“Sammy Gray” begins to make threats against the minor victims, which include threatening to contact police or send the minor victims explicit images to family. In both instances, “Sammy Gray” then requests the minor victim to appear on video chat with “Sammy Gray” and/or perform sexually explicit acts on video.

5. In the conversation with MV1, “Sammy Gray” tells MV1 he was going to call her and “no matter what my voice sounds like you’re going to answer my questions it’s going to be a video chat understand.” MV1 reported that the voice sounded like a male.
6. In the conversation with MV2, “Sammy Gray” demands MV2 perform oral sex on her minor brother on video for “Sammy Gray” or “Sammy Gray” would send MV2’s sexually explicit images of her breasts and the conversation to MV2’s family members.
7. In both of the above-mentioned conversations, MV1 and MV2 identify themselves as minors when asked by “Sammy Gray”.
8. An Oregon search warrant was executed on the “Sammy Gray” Facebook account for the time period of April 1, 2020 to May 31, 2020. The account name was shown as “Sammy Gray”, with listed Universal Identifier (UID) as 100047941823960, and a registered email address of gsammy413@gmail.com. Facebook reported the account was still active (as of August 8, 2020) and provided a creation date on March 4, 2020, at 18:56:23UTC with an IP address 64.127.80.46. Facebook IP logs shows that IP address 64.127.80.46 was used to login to the account over 145 times from April 1, 2020, to May 31, 2020.
9. The Facebook communications with MV1 occurred on May 8, 2020, between 12:30:11 UTC and 12:59:00 UTC. The Facebook IP logs show that IP address 64.127.80.46 was used to login to the account twice on May 8, 2020, at 07:02:04 UTC, and again at 12:50:24 UTC. Det. Bohn determined that IP address 64.127.80.46 was registered to Hamilton County Communications, Dahlgren, Illinois. Facebook also provided information about the mobile device that is associated with the “Sammy Gray” account.

10. Records received from Hamilton County Communications showed that IP address 64.127.80.46 was assigned to Jeff Leinard, 1276 North Street, Mill Shoals, IL 62862; old cell number: 618-919-1866; new cell number: 618-919-1863; email: jsleinard01@gmail.com. Hamilton County Communications provided records which showed that IP address 64.127.80.46 was assigned to Leinard at that location from at least November 1, 2019, to September 15, 2020.
11. On August 26, 2020, an Oregon search warrant was issued for the Google account of gsammy413@gmail.com, which was connected to the "Sammy Gray" Facebook account. Google provided subscriber information and identified the account was created on March 4, 2020, at 18:50:48 UTC from IP address 64.127.80.46. Google reported that there were no other logins to the account. This email account was created six minutes prior to the "Sammy Gray" Facebook account being created.
12. Google reported the account had an email address of gsammy413@gmail.com with a recovery email address of rottweiler20132014@gmail.com and a recovery SMS as 618-599-2855. Google reported the Sign-in/User/Reachable phone number for the account as 618-599-2855.
13. The Illinois Secretary of State database showed three individuals (as of 09/01/20) to have valid Illinois Driver's Licenses at 1276 North Street, Mill Shoals, IL: Jeffrey Leinard (DOB 04/10/1973); Katherine Leinard (DOB 10/03/1975); and Michael FERRIS (DOB 06/05/1978).
14. A check of a law enforcement database showed that Michael FERRIS was associated with phone number 618-599-2855 and an email address of rottweiler20132014@gmail.com.
15. SA Bowers located a publicly viewable Facebook page for Michael FERRIS, which had a user ID of "rottweiler78." The account contained several photos of a white male in his 40's. SA Bowers compared the Illinois Driver's License photo of Michael

FERRIS with the photos in the Michael FERRIS Facebook page and believes that the photos on the Facebook page are of Michael FERRIS (DOB 06/05/1978).

16. In response to a legal process document, Facebook provided subscriber information for Facebook account "rottweiler78" which showed that the account holder's name was listed as Michael FERRIS, with a registered email address of rottweiler20132014@gmail.com. IP history logs show that the account was accessed multiple times by IP address 64.127.80.46 from March 2, 2020, through August 16, 2020.
17. In October 2020, Detective Steve Bohn advised that he had conducted a review of the contents of the "Sammy Gray" Facebook account and that he had identified 24 accounts with which "Sammy Gray" had corresponded and in which the individuals self-identified as minor females. Det. Bohn advised "Sammy Gray" communication with these accounts follows a similar pattern in which "Sammy Gray" identifies the individuals as minors, and then asks the girls if fathers / brothers had ever walked in on them while they were naked. If the girl says yes, then "Sammy Gray" threatens to call the police and report her unless she provides him with sexually explicit pictures or videos. After receiving the pictures / videos from the victim, "Sammy Gray" often threatens to send those pictures / videos to the victim's friends / family unless the victim continues to comply with "Sammy Gray" demands.

IDENTIFICATION OF MV3

18. On October 23, 2020, Oklahoma State Bureau of Investigation Special Agent Courtney Barnett advised your affiant that she had interviewed a 14-year-old female, (hereinafter Minor Victim 3 / MV3) who had communicated with "Sammy Gray" through Facebook in or around May 2020.
19. MV3 was interviewed at a child advocacy center in Oklahoma and law enforcement reviewed MV3's Facebook messages. MV3 disclosed that she had communicated

through Facebook with a person named “Christine James” (Facebook UID 100050179159351). “Christine James” coerced MV3 into making a live video call with “Christine James” while MV3 was naked. “Christine James” took screenshots during the live video call which captured images of MV3’s breasts and genitals. Soon after engaging in a live video call with “Christine James”, MV3 was contacted by “Sammy Gray”, who identified himself as a Cyber Crimes Investigator. “Sammy Gray” sent MV3 the screenshots of MV3 naked which had been taken by “Christine James”, indicating that “Christine James” / “Sammy Gray” were possibly the same person. “Sammy Gray” threatened to send MV3’s pictures to the police or to her friends / family. “Sammy Gray” coerced MV3 into having sexual intercourse with her 16 year old brother and allowing “Sammy Gray” to view the activity while on a live video call with him.

20. After “Sammy Gray” coerced MV3 to have sexual contact with her minor brother, “Christine James” sent screen shots of the sexual contact between MV3 and the minor brother to MV3’s boyfriend through Facebook. “Sammy Gray” sent MV3 screenshots of MV3’s genitals that had been captured during a live video chat.
21. In response to a federal search warrant, Facebook provided records for the account of “Sammy Gray” (UID 100047941823960) on or around October 30, 2020. These records encompass a larger time frame, from March 4, 2020, to September 25, 2020, than those records which were provided in response to Detective Bohn’s state search warrant. Records provided to Detective Bohn included approximately 12,000 pages of communications, but the response received by SA Bowers included approximately 44,000 pages of communications. A preliminary review of these communications appears to show that there are many more suspected minor victims than were previously identified by Detective Bohn.

22. On October 28, 2020, US Magistrate Judge Mark Beatty issued a federal search warrant for the premises at 1276 North Street, Mill Shoals, IL.
23. On November 5, 2020, law enforcement officers executed the search warrant at 1276 North Street, Mill Shoals, IL. Agents identified FERRIS and Jeffrey Leinard inside the residence.
24. Leinard advised the location of his bedroom and the location of FERRIS' bedroom. Agents recovered a Samsung cellphone from the bedroom identified as FERRIS' bedroom.
25. Your affiant conducted an audio and video recorded interview with FERRIS. FERRIS was advised of his Miranda rights. FERRIS acknowledged that he understood his rights and was willing to waive his rights and speak with the investigators. FERRIS signed a waiver form.
26. FERRIS stated that he has lived in the residence with Leinard for about the last year. FERRIS identified his bedroom in the residence as the same room that had previously been identified by Leinard. FERRIS acknowledged that his cellphone was in his bedroom. FERRIS stated that his phone number was 618-599-2855. FERRIS confirmed that a back room in the residence was the "computer room" which contained two computers. FERRIS identified a laptop which was currently hooked up to a separate video monitor. FERRIS said that he had used this computer as recently as the previous evening. FERRIS said that this laptop computer was used by FERRIS, Leinard, and Leinard's wife. FERRIS stated that he knew the username and the password for this laptop. He said that the password hasn't been changed since he has lived at the residence. FERRIS said that there was another computer on the other side of the room but suggested that this computer was infrequently used.
27. Leinard had previously informed law enforcement that his wife had not resided at the residence for approximately three months.

28. FERRIS confirmed his email account is rottweiler20132014@gmail.com. He said that he's had this email address for a long time. Your affiant stated that Google had provided information which showed that FERRIS' email account (rottweiler20132014@gmail.com) and his phone number (618-599-2855) had been used to establish an email account, "gsammy". FERRIS said he had no knowledge of this account and that he never created or used this account.

29. SA Bowers explained that agents had received a tip about an individual, Sammy Gray, that had used Facebook to threaten / blackmail a juvenile female into sending pictures of her breasts. FERRIS denied any knowledge of a Sammy Gray Facebook account or of any individual named Sammy Gray. SA Bowers said that there was another Facebook account, Christine James, that was also used to communicate with minor females. FERRIS denied any knowledge of a Christine Gray Facebook account or of any individual named Christine James.

30. FERRIS reiterated that he didn't know anything about exploitation of minors. SA Bowers asked FERRIS if he would consent to an examination of his cellphone in order to verify his statements. FERRIS declined to give consent for the examination of his cellphone. FERRIS stated that he didn't want to get in trouble for something that someone else possibly could have put on his phone.

31. Once informed about specifics of the investigation and the search warrant for FERRIS mobile device, FERRIS stated that he wasn't comfortable speaking anymore without a lawyer. Agents stopped the interview and left the room.

32. The forensic examination of FERRIS' cellphone identified the device as a Samsung phone, model SM-S367VL, IMEI 352069100064129. The phone was manufactured in Vietnam. The phone number was identified as 618-599-2855 with Verizon.

33. The preliminary exam of the cellphone showed a forensic artifact which indicated that email account gsammy413@gmail.com had synced with FERRIS' phone on March 4,

2020. Two other artifacts, dated March 4, 2020, showed that gsammy413@gmail.com was associated on this device with Google Drive and Google Play Services.

34. The preliminary exam of the cellphone showed that there was a Facebook account which had been logged into on this phone, identified as “Sarah Mansfield” (UID 100056711666343). The exam showed that there were 120 conversations in which “Sarah Mansfield” was a participant. The Sarah Mansfield account is identified as the “owner”, meaning that this account is logged into on the phone. The most recent conversation occurred early in the morning on November 5, 2020.
35. A query of the forensic report showed that there are twenty-four conversations on the device which include the phrase, “bullied or picked on.” There are six conversations on the device which include the phrase, “showering or changing”.
36. SA Bowers identified at least two conversations in which “Sarah Mansfield” initiated contact with a Facebook user, who identified themselves as a minor. Mansfield then followed the established pattern of “Sammy Gray” where the offender asks if the minor is bullied or picked on, then asks if brother / father has walked in and seen the user’s breasts while showering or changing, then asks the user to send sexually explicit pictures and threatening the user in order to gain the user’s compliance. SA Bowers was unable to verify if these particular Facebook users actually sent sexually explicit pictures to Mansfield as the examination is on going.

FURTHER YOUR AFFIANT SAYETH NOT



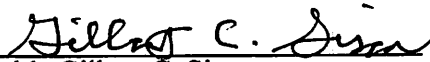
Eric V. Bowers
Special Agent
Department of Homeland Security
Homeland Security Investigations



Alexandria Burns
Assistant United States Attorney

State of Illinois)
) SS.
County of St. Clair)

Sworn on the 6th day of November 2020, in East Saint Louis, Illinois, within the Southern District of Illinois.



Honorable Gilbert C. Sison
United States Magistrate Judge